

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Plains Marketing, LP
St James Terminal
Agency Interest No.: 129733
Activity Number: PER20080003
Proposed Permit Number: 2560-00271-V0**

I. APPLICANT

Company:
Plains Marketing, LP
PO Box 4648
Houston, TX 77210-4648

Facility:
St. James Terminal
8 miles west-northwest of North Vacherie along Hwy 18
St. James Parish, Louisiana
UTM: Zone 15 707738 E 3321219 N

II. FACILITY AND CURRENT PERMIT STATUS

Plains Marketing, LLC, St. James Terminal, is an existing crude oil terminal located 8 miles west-northwest of North Vacherie along Hwy 18, St. James, Louisiana, St. James Parish. The site currently operates under Permit No. 2560-00271-02 dated July 11, 2008.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Plains Marketing, LP on December 8, 2008, requesting a major modification.

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Project

Plains Marketing LP, St. James Terminal is a crude oil terminal, crude oil into the facility via pipelines for storage, blending and transport out via pipelines.

The proposed modifications for the facility are as follows:

1. Install six (6) 280,000 bbl internal floating roof tanks (T-5120/EQT021, T-5130/EQT022, T-5140/EQT023, T-5150/EQT024, T-5160/EQT025, T-5170/EQT026) for the storage of condensate;
2. Add additional fugitive components;
3. Reconcile emissions associated with the roof landings of the crude oil tanks; and
4. Delete the Marine Dock Emergency Firewater Pump (Emission Point E-02/EQT015).

Proposed Permit

Permit 2560-00271-V0 will be a Part 70 operating permit from a major modification for the St. James Terminal.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	0.03	0.02	- 0.01
SO ₂	0.03	0.01	- 0.02
NO _x	1.82	1.65	- 0.17
CO	1.00	0.94	- 0.06
VOC *	97.43	179.04	+ 81.61

Note: There is an increase of 81.41 tons VOC emissions from Condensate Storage Tanks Cap. The facility is a major source pursuant to LAC 33:III.509; however, the PSD Review is not required since the emissions of any regulated pollutant do not exceed 250 tons per year.

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Benzene	0.63	0.85	+ 0.22
Cumene	0.02	0.25	+ 0.23
Ethyl benzene	0.15	0.18	+ 0.03
n-Hexane	0.55	0.74	+ 0.19
Toluene	0.63	0.87	+ 0.24
Xylene (mixed isomers)	0.56	0.64	+ 0.08

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<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Total	2.54	3.53	+ 0.99
Other VOC (TPY)		175.51	

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

<u>ID No.</u>	<u>Requirement</u>	<u>Note</u>
N/A	-	-

Prevention of Significant Deterioration/Nonattainment Review

The facility is a major source pursuant to LAC 33:III.509; however, the PSD Review is not required since the emissions of any regulated pollutant do not exceed 250 tons per year.

MACT Requirements

The St. James Terminal is not a major source of toxic air pollutants as defined in LAC 33:III.Chapter 51. Therefore, Maximum Achievable Control Technology (MACT) is not applicable.

Air Quality Analysis

Impact on air quality from the emissions of the proposed unit will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

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Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

Not Applicable

VI. PERIODIC MONITORING

Not Applicable

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

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PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.